

# Law Office of Angus James Bell

30 Wall Street, 8<sup>th</sup> Floor New York, New York 10005

Tel: (212) 804-5765 Fax: (718) 504-6351

Email: ajamesbelllaw@gmail.com

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January 5, 2021

Via ECF

Hon. Loretta A. Preska  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: United States v. Christian Del Rosario 03-cr-501-(LAP)

Dear Judge Preska:

I am CJA appointed counsel for Mr. Christian Del Rosario and write this letter to seek the appointment of Ms. Marisa Benton, Esq. as associate counsel to assist with the review of voluminous medical records and preparation of his application for compassionate release at a rate of \$90 per hour.

Ms. Benton is an experienced attorney who has been appointed under the CJA to assist on numerous cases in the Southern and Eastern District of New York to review voluminous discovery, review the same with clients, prepare legal memoranda and trial preparation. She would be a valuable addition to the defense and will result in significant cost savings to the Court.

I further submit that such appointment is necessary for the effective representation of this indigent defendant and is consistent with the statutory authority for the provision of ancillary services in an appointed case. Counsel specifically requests approval for an initial 50 hours at \$90 hours without prejudice to seeking authority for additional time should the review goes beyond the 50 hours.

Thank you in advance for any and all consideration of this application. We will await further instructions from the Court on this matter.

Respectfully submitted,

*A. James Bell*  
A James Bell, Esq.

SO ORDERED.

Cc: All counsel, by ECF

Dated: January 5, 2021  
New York, New York

*Loretta A. Preska*  
LORETTA A. PRESKA, U.S.D.J.